

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE:

DELPHI CORPORATION, et al

Case No. 05-44481 (RDD)  
Chapter 11 proceeding

Debtor.

[Jointly Administered]


**AFFIDAVIT OF PATRICK ROBERTSON IN SUPPORT OF MACARTHUR CORP'S  
OBJECTION TO DEBTOR'S EXPEDITED MOTION TO STRIKE (I) NON-  
CONFORMING CURE AMOUNT NOTICES AND (II) IMPROPER OBJECTIONS  
PURSUANT TO SOLICITATION PROCEDURES ORDER, CONFIRMATION ORDER,  
PLAN OF REORGANIZATION**

STATE OF MICHIGAN     )  
                                  ) ss:  
COUNTY OF GENESEE )


My name is Patrick Robertson, I am competent to testify, and testify to the following matters upon my personal knowledge:

1. I am the Controller for Creditor MacArthur Corp and was tasked with reviewing the Notices of Cure Amount sent by Debtor Delphi Corporation to MacArthur and attempting to determine whether the amounts sought to be cured were correct.
2. MacArthur Corp received four hundred and ninety-two (492) copies of the Notice of Cure Amount on its contracts with the Debtor. MacArthur reviewed every single copy of the Notice and determined them all to be exactly the same.
3. Further, MacArthur Corp determined that the amount sought to be cured on several of the contracts was incorrect.
4. MacArthur Corp executed one of the Notices and forwarded it to local counsel to be served on Kurtzman Carson Consultants pursuant to the instructions on the Notice. If there was a Notice that was different than the one mailed to Kurtzman Carson Consultants, MacArthur Corp did not receive it.
5. Further affiant sayeth not.

Dated: February 20, 2008

  
\_\_\_\_\_  
Patrick Robertson

On this 20<sup>th</sup> day of February, 2008, before me, A Notary Public, in and for said County, personally appeared Patrick Robertson, to me known to be the person described in and who executed the foregoing instrument and acknowledged that he executed the same as his free act and deed.

  
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Gina M. Herron, Notary Public  
Genesee County, Michigan  
Acting in Genesee County  
My commission expires: 9-17-11